

TROUTMAN PEPPER LOCKE LLP  
8985 S. EASTERN AVENUE  
STE. 200  
LAS VEGAS, NV 89123

Kevin F. Kieffer, Nevada Bar No. 7045  
kevin.kieffer@troutman.com  
TROUTMAN PEPPER LOCKE LLP  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, NV 89123 (*Nevada Office*)  
Tel: (213) 928-9800

TROUTMAN PEPPER LOCKE LLP  
600 Peachtree St., NE #3000  
Atlanta, GA 30308 (*Corporate Office*)

Attorney for Defendant  
LexisNexis Risk Solutions Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DAWN MARTIN

Plaintiff,

v.

LEXISNEXIS RISK SOLUTIONS  
INC.

Defendant.

Case No.: 2:25-cv-00779

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT  
(First Request)**

On May 5, 2025, Plaintiff Dawn Martin (“Plaintiff”) filed her Complaint. ECF No. 3. On May 9, 2025, the Complaint was served on Defendant LexisNexis Risk Solutions Inc. (“LexisNexis Risk”). ECF No. 5. LexisNexis Risk’s deadline to respond to the Complaint is May 30, 2025. Pursuant to Local Rules 6-1 and 6-2, Plaintiff and Defendant (collectively, “Parties”) together bring this Stipulation for Extension for Time to Respond to Complaint (“Stipulation”). In support of this Stipulation, the Parties state as follows:

1. Counsel for LexisNexis Risk was recently engaged. Thus, they require additional time to adequately review the allegations in the Complaint and prepare an

1 appropriate response.

2 2. On May 21, 2025, counsel for LexisNexis Risk contacted counsel for  
3 Plaintiff regarding an extension. Plaintiff does not oppose LexisNexis Risk's request.

4 3. Good cause exists because an extension will allow counsel for  
5 LexisNexis Risk to evaluate the merits of the claim and develop an expedient strategy  
6 to address the dispute. The extension does not alter any deadlines or events set by the  
7 Court, was not made for purposes of delay, and will not prejudice Plaintiff. This is the  
8 Parties' first stipulation for an extension.

9 4. Plaintiff and LexisNexis Risk hereby stipulate to a twenty-one (21) day  
10 extension of LexisNexis Risk's deadline to respond to Plaintiff's Complaint.  
11 LexisNexis Risk shall have until June 20, 2025, to file its responsive pleading.

12 LexisNexis Risk respectfully requests that the Court enter an Order providing  
13 LexisNexis Risk with an extension of time up to and including June 20, 2025, to file  
14 its response to Plaintiff's Complaint.

15 Dated: May 28, 2025

By: /s/ Kevin L. Hernandez  
Kevin L. Hernandez, Nevada Bar No.  
12594  
*Attorney for Plaintiff Dawn Martin*

19 Dated: May 28, 2025

/s/ Kevin F. Kieffer  
Kevin F. Kieffer, Nevada Bar No. 7045  
*Attorney for Defendant*  
*LexisNexis Risk Solutions Inc.*

**IT IS SO ORDERED:**

  
\_\_\_\_\_  
Honorable Nancy J. Koppe  
United States Magistrate Judge

Dated: May 29, 2025